

UNITED STATES OF AMERICA
DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 2019-CR-10459-RWZ-47

UNITED STATES OF AMERICA

V.

INES LUGO

ASSENTED TO MOTION TO AMEND CONDITIONS OF RELEASE #3

Now comes defendant Ines Lugo and, with Probation's and the government's assent, moves this Honorable Court to authorize the defendant to leave the Commonwealth of Massachusetts. She seeks permission to travel into Rhode Island on a regular basis for purposes of employment. She seeks permission to travel to New Hampshire on October 19, 2020 to attend a family matter. The defendant seeks this permission in order to make food deliveries for "Doordash" and to attend a rescheduled party for her granddaughter's birthday at Spooky World in Litchfield, NH.

Rhode Island on a Recurring Basis.

Lugo has a second job. She delivers for Doordash. Because she delivers food from restaurants in the New Bedford area, many of the takeout orders need to be delivered to towns in RI. Currently, she has to turn down those jobs.

New Hampshire on October 19, 2020.

Previously, Lugo was granted permission to leave Massachusetts in order to go to Canobie Lake Park, Salem, NH on August 29. It was supposed to be her granddaughter's birthday

party. The visit to Canobie Lake Park was canceled due to bad weather. The family has rescheduled the party at Spooky World, Litchfield, NH on October 19.

Prior Permission to Leave Massachusetts.

Ms. Lugo was permitted to visit a friend in a RI hospital at the end of July. That travel and return occurred without incident.

Assent.

Probation Officer Mona Lisa Andrade and AUSA Phil Mallard assent to this motion.

**Respectfully Submitted,
INES LUGO,
By his attorney:**

/s/ Thomas Kerner

**J. THOMAS KERNER
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CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing [NEF] and paper copies will be sent to those indicated as non-registered participants.

Date: 10/11/2020

/s/ Thomas Kerner

**J. Thomas Kerner
BBO# 552373**